

**ATTACHMENT A**  
**Statement of Facts**

*The United States and Defendant Shaun VALENTE stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below beyond a reasonable doubt. They further stipulate and agree that these are not all of the facts that the United States would prove if this case proceeded to trial.*

At all relevant times to this case, **SHAUN VALENTE ("VALENTE")** was a resident of Montgomery Village, Maryland. From at least March 2013 through at least September 2014, **VALENTE** used email, cloud storage programs, internet chat messaging, and other internet-based programs to distribute and receive child pornography.

On April 25, 2013, **VALENTE** opened an online storage account with Dropbox. On February 26, 2014, Dropbox reported to the National Center for Missing and Exploited Children that images of children engaged in sexually explicit conduct had been uploaded to **VALENTE'S** Dropbox account, including the following image, among others:

**6e7aa5a7-7552-40c8-91bd-550a4184185e.jpg** – this image depicts a prepubescent female lying on her back. The focus of the image is on the prepubescent female's genitalia. The prepubescent female's anus is being penetrated by a male's erect penis.

On or about September 12 and 14, 2013, **VALENTE** received two different emails at email address familyfun11@hotmail.com from an individual in Missouri that contained a video and images of children engaged in sexually explicit conduct. The second email included three images of the same minor female. All three images depict an adult male's hand pulling aside the shorts and underwear of a prepubescent female and exposing her vagina. In two of the images, the adult male's hand is spreading the lips of the prepubescent female's vagina. The individual in Missouri who sent them email with the images indicated that the images depicted his daughter.

On April 5, 2014, **VALENTE**, using the email account familyfun11@hotmail.com, distributed the following images of children engaged in sexually explicit conduct to an individual in Texas via email:

**22.jpg** – This image depicts a naked prepubescent female lying on her back. Each of the prepubescent female's thighs is duct taped to her ankles and her legs are spread. There is a naked adult male wearing a black mask and kneeling between the prepubescent female's legs. The adult male's erect penis is penetrating the prepubescent female's vagina.

**05 Cassie.jpg** – This image depicts a naked prepubescent female lying on her back on a bed with her legs spread exposing her genitalia. The prepubescent female's right hand is on her vagina. The focus of this image is the prepubescent female's genitalia.



**13601852246\_2004\_01\_15\_21\_12\_38.jpg** – This image depicts two males naked from the waist down straddling each other. There is a prepubescent female lying down between the males and the prepubescent female has the two erect penises in her mouth.

On September 12, 2014, federal agents from the Department of Homeland Security executed a search warrant at VALENTE'S residence. Agents seized a notebook computer, cellular phone, and flash drives that contained more than 4,000 images and approximately 175 videos depicting children engaged in sexually explicit conduct. The following are examples of the images and videos contained on VALENTE'S seized digital media on September 12, 2014:

**1370792526394.jpg** – This image depicts a naked prepubescent female lying on her back with her hands tied above her head with white rope. Each of the prepubescent female's legs is also tied with white rope spreading her legs apart exposing her genitalia. The prepubescent female is also wearing a ball gag and has "lick me please" and an arrow pointing to her genitalia written on her stomach.

**1370792816708.jpg** – This image depicts a prepubescent female wearing only black and white striped knee high socks lying on her back. The prepubescent female's arms are stretched above her head and her hands are tied with white material. There is a black strip of material tying each of the prepubescent female's thighs to her shins and her legs are spread exposing her genitalia. There is a naked male between the prepubescent female's legs and his penis is penetrating the vagina of the prepubescent female.

Forensic analysis of the digital media seized from VALENTE also revealed that VALENTE received child pornography via Yahoo Messenger, including the following video received on March 13, 2013:

**Securedownload.wmv** – this video is approximately 51 second long and depicts a female performing oral sex on a prepubescent female.

The images and videos described above depict real children engaged in sexually explicit conduct. VALENTE downloaded and distributed images and videos of child pornography using the internet, and therefore such images and videos traveled in interstate commerce.

On September 12, 2014, during the execution of the search warrant at VALENTE'S residence, federal agents also interviewed VALENTE. ~~After waiving his Miranda rights,~~ VALENTE admitted that he had downloaded and distributed child pornography. VALENTE admitted that he sent and received child pornography using the email account familyfun11@hotmail.com. VALENTE also admitted that he uploaded child pornography to his Dropbox account. VALENTE indicated that he has a sexual interest in 8-9 year old girls. VALENTE also admitted that, in 2004 after being arrested but before being convicted for sexual abuse of a minor, VALENTE downloaded images of child pornography. VALENTE saved a flash drive containing those downloaded images in a safe in his residence.

ASF  
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On March 22, 2005, VALENTE was convicted of sexual abuse of a minor and ~~distribution and manufacturing~~ of child pornography <sup>offense</sup> in Montgomery County Circuit Court. VALENTE was sentenced to four years of incarceration with all but 18 months suspended.

I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

5/20/2015  
Date

Shaun Valente  
Shaun Valente

I am Shaun Valente's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is an informed and voluntary one.

5/20/15  
Date

Amy Fitzgibbons  
Amy Fitzgibbons, Esq.